

GREG ABBOTT, in his official capacity as Governor of the State of Texas, STEVEN C. MCCRAW, in his official capacity as Director and Colonel of the Texas Department of Public Safety, AMANDA CRAWFORD, in her official capacity as Executive Director of the Texas Department of Information Resources and Chief Information Officer of Texas, DALE RICHARDSON, in his official capacity as Chief Operations Officer of the Texas Department of Information Resources, ASHOK MAGO, LAURA WRIGHT, LINDY RYDMAN, CARLOS MUNGUIA, MARY DENNY, MILTON B. LEE, MELISA DENIS, DANIEL FEEHAN, and JOHN SCOTT, JR., in their official capacities as members of the Board of Regents of the University of North Texas System, and MICHAEL WILLIAMS, in his official capacity as Chancellor of the University of North Texas System,

*Defendants.*

**DEFENDANTS' SECOND UNOPPOSED MOTION TO EXTEND TIME TO  
FILE A RESPONSIVE PLEADING**

Defendants Greg Abbott, Steven C. McCraw, Amanda Crawford, Dale Richardson, Ashok Mago, Laura Wright, Lindy Rydman, Carlos Munguia, Mary

Denny, Milton B. Lee, Melisa Denis, Daniel Feehan, John Scott, Jr., and Michael Williams (collectively “Defendants”) request that their deadline to file an answer or other responsive pleading under Fed. R. Civ. P. 12 be extended ten days, until September 18, 2023. Defendants request this extension as their counsel has recently been involved in complex discovery issues and other urgent legal matters, which have reduced the amount of time he has had to review this case and prepare a responsive pleading.

This is Defendants’ second request for an extension. Plaintiff’s counsel was unopposed to this request. We thank the Court for its time and attention to this matter.

Dated: August 23, 2023

Respectfully submitted,

ANGELA COLMENERO  
Provisional Attorney General of Texas

BRENT WEBSTER  
First Assistant Attorney General

GRANT DORFMAN  
Deputy First Assistant Attorney General

JAMES LLOYD  
Interim Deputy Attorney General for Civil  
Litigation

KIMBERLY GDULA  
Deputy Chief, General Litigation Division

RYAN KERCHER  
Deputy Chief, General Litigation Division

/s/Todd Dickerson  
TODD DICKERSON  
Attorney-in-charge

Texas Bar No. 24118368  
Office of the Attorney General  
Assistant Attorney General  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711-2548  
(512) 463-2120 | FAX: (512) 320-0667  
Todd.Dickerson@oag.texas.gov  
**ATTORNEYS FOR DEFENDANTS**

### **CERTIFICATE OF CONFERENCE**

I hereby certify that on August 23, 2023, I emailed counsel for the Plaintiff regarding a 10-day extension to file answers or responses on behalf of all Defendants. Plaintiff's counsel advised that she was unopposed to the request.

/s/ Todd Dickerson  
TODD DICKERSON

### **CERTIFICATE OF SERVICE**

I hereby certify that on August 23, 2023, a true and correct copy of the foregoing instrument has been served electronically through the electronic-filing manager to:

Peter B. Steffensen  
SMU Dedman School of Law  
First Amendment Clinic  
P.O. Box 750116  
Dallas, TX 75275  
(214) 768-4077  
[psteffensen@smu.edu](mailto:psteffensen@smu.edu)

Jameel Jaffer  
Ramya Krishnan  
Stacy Livingston  
Knight First Amendment Institute  
at Columbia University  
475 Riverside Drive, Suite 302  
New York, NY 10115  
(646) 745-8500  
[jameel.jaffer@knightcolumbia.org](mailto:jameel.jaffer@knightcolumbia.org)  
[ramya.krishnan@knightcolumbia.org](mailto:ramya.krishnan@knightcolumbia.org)  
*Counsel for Plaintiff*

/s/ Todd Dickerson  
TODD DICKERSON